

*Big Country Christian Radio Institute*  
RECEIVED 927 East Glass Avenue

JUL 26 1999

Spokane WA 99207

FCC MAIL ROOM

20 July 1999

*The Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street NW  
Washington DC 20554*

*Dear Secretary,*

*Enclosed are five (5) copies of a petition seeking amendment to the FCC FM Table of Allotments, adding Channel 287A to Libby, Montana as a non-commercial educational channel.*

*Because BIG COUNTRY CHRISTIAN RADIO INSTITUTE (BCCRI) is a recognized non-profit educational entity, no filing fee is required per the Commission's' rules.*

*PLEASE NOTE! A similar application was mailed to your office on 1/27/99, but there is no evidence it was received.*

*I trust this petition meets all requirements set forth by your agency.*

*Sincerely,*

*C Howard McDonald*  
C Howard McDonald  
Representative and engineer  
BCCRI

509-484-4531  
800-498-4531 + 97

cc: BCCRI President, file

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List ABCDE

045

MMB

*PETITION FOR RULEMAKING*

*Allocation of FM Channel*

*287A (105.3mHz)*

*(Designated as educational)*

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MAY 26 1999

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*To*

*Libby, Montana*



*BIG COUNTRY CHRISTIAN RADIO INSTITUTE*

*Spokane, Washington*

BEFORE THE  
Federal Communications Commission

Washington DC

IN THE MATTER OF:

A petition for rulemaking by BIG )  
COUNTRY CHRISTIAN RADIO )  
INSTITUTE of Spokane, Washington, )  
Seeking an amendment to the FM Table )  
of Allotments (Section 73.202 of the )  
Commission's rules )

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JUN 26 1999  
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TO THE COMMISSION:

This petition for rulemaking asks the Commission to amend the FM Table of Allotments by adding Channel 287A (105.3 mHz) to Libby, Montana and designate that channel as non-commercial educational.

If granted, this allotment will provide for a non-commercial educational channel at Libby that will not be in conflict with the FCC rules or other NCE stations. At present, the educational portion of the FM band in the Libby area is practically closed to new authorizations due to the proximity of KHQTV (Channel 6) at Spokane, Washington along with several other stations or authorizations.

THEREFORE, this petition asks that the specified channel be allocated to Libby and designated as educational.

This petition is based on geographical co-ordinates North 48:23:21 and West 117:33:25, the official co-ordinates of Libby, Montana

Exhibits follow

## EXHIBIT ONE

### *Statement concerning availability of NCE channels at Libby, Montana*

1. Section 73.525 of the Commission's rules states the required distances between NCE stations operating on channels 200 through 220 and TV channel 6.
2. Libby, Montana is 158 kilometers from the transmitter site of KHQTV (closest channel six allotment) at Spokane, Washington (North 47:34:52 and West 117:17:47). This eliminates channels 200 through 219 as possible frequencies within the NCE band. FM channel 200 cannot be utilized because of KSFC 91.9 mHz at Spokane. KSFC is a class C2 station and the required separation between co-channel class A and C2 stations is 166 km.
3. The matter is also complicated by a NEW application for 92.1 mHz at Bonners Ferry, Idaho along with the authorization of KQRK (92.3 mHz) at Ronan, Montana.
4. Exhibit two is a channel study showing the allotment of channel 287A would conform to all FCC rules and Canadian separation requirements. In addition, the attached map shows the KHQTV 47 dBu contour that entirely encompasses the city of Libby.

BIG COUNTRY CHRISTIAN RADIO INSTITUTE intends to apply for a construction permit to build an NCE station on channel 297A when the Commission grants the petition.

BIG COUNTRY CHRISTIAN RADIO INSTUTUTE is incorporated as a non-profit entity under the laws of the State of Montana.

# Supplement to Exhibit One

## Contour map showing 47 dBu

### Contour of KHQTV

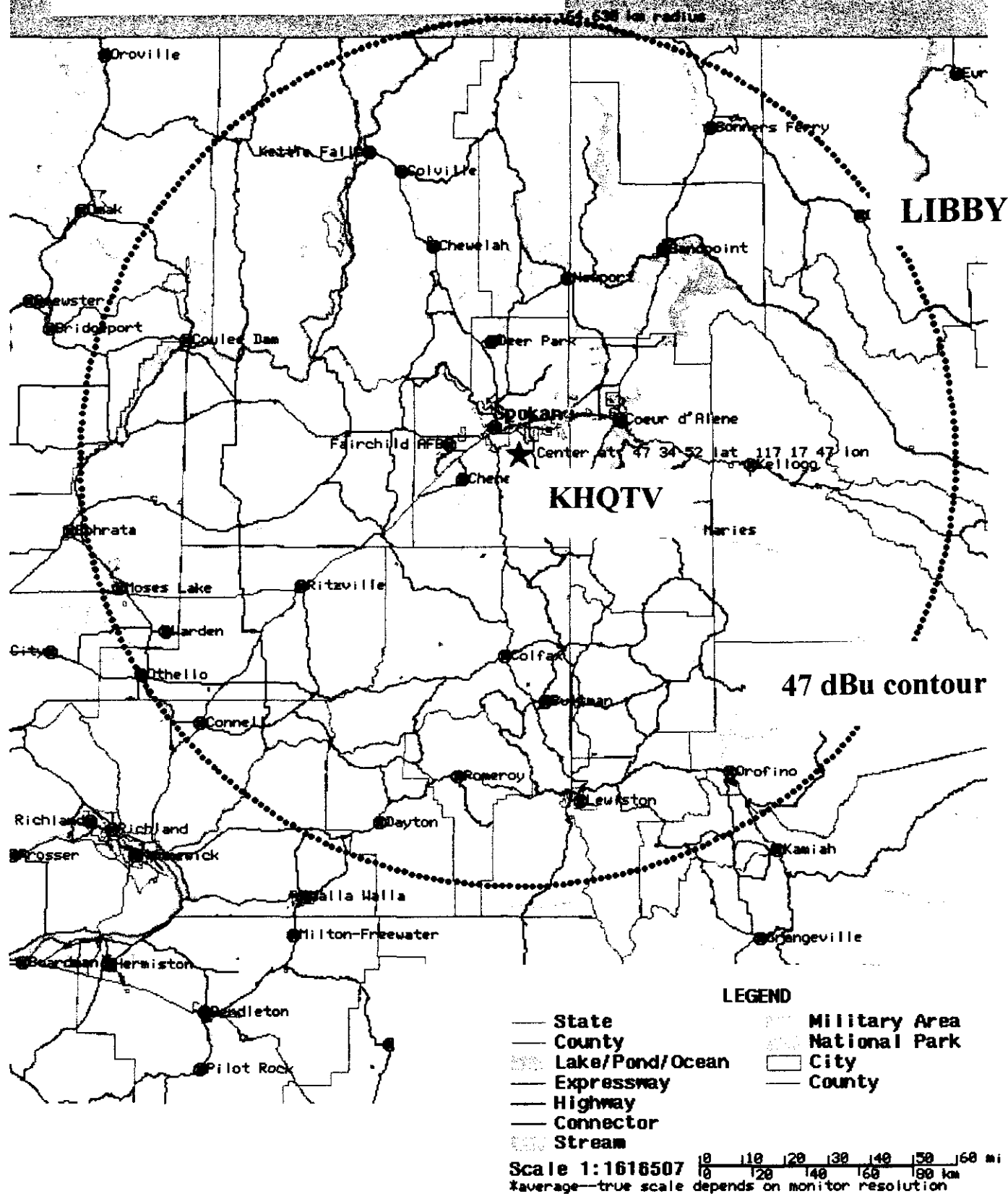


Exhibit Two  
Libby Channel Study  
Separation carried out to 306 km  
Canadian separation C to C

Ch	freq	call	location	type	____Separation____		
					actual	req	class
284	104.7	KEEH	Spokane WA	A	158	31	A-A
3 <sup>rd</sup> -		NEW	Cranbrook BC	C	122	110*	C-A
285	104.9	KMJY	Newport WA	A	112	72	A-A
2 <sup>nd</sup> -		allot	Bon'ton Falls BC	A	186	98*	A-A
286	105.1	KVTY	Lewiston ID	A	242	72	A-A
1 <sup>st</sup> ~		allot	Osoyoos BC	B	305	137*	B-A
287	105.3	KMTXFM	Helena MT	C	303	226	C-A
co-channel		allot	Trail BC	A	183	151*	A-A
288	105.5	allot	Claresholm AB	A	232	98*	A-A
1 <sup>st</sup> +		allot	Edgewood BC	A	239	98*	A-A
		allot	Moyie BC	A	116	98*	A-A
289	105.7	CBYSFM	Sparwood BC	A	157	51*	A-A
2 <sup>nd</sup> +		KAEP	Spokane WA	C	158	95	C-A
290	105.9	NEW	Invermere BC	A	235	42*	A-A
3 <sup>rd</sup> +							

\*= Canadian separation standards

If separation: 105.3 + 10.6 = 115.9 outside FM band  
 105.3 ~ 10.6 = 94.7 none within 49 km limit  
 105.3 + 10.8 = 116.1 outside FM band  
 105.3 ~ 10.8 = none within 48 km limit

## AFFIDAVIT

THIS IS TO CERTIFY I am the engineer that prepared this application for rulemaking to amend the FCC FM table of Allotments to add channel 287A to Libby, Montana as an educational allocation. I am solely responsible for its contents. Therefore, I state the following:

1. I have been a broadcast engineer and chief operator for various radio stations since 1960 and have held a First Class Radiotelephone license (now the General Certificate) since then. I am a registered radio engineer with the state of Montana.
2. I have served as Chief Engineer for radio stations at Red Lodge and Billings, Montana; Minneapolis, Minnesota; Springfield, Missouri and Coeur d' Alene, Idaho.
3. I have personally prepared many applications for construction permits, both AM and FM that have been accepted by the FCC along with several amendments to the FM Table of Allotments.
4. I am a graduate of the National Radio Institute (NRI) at Washington, DC; the United States Air Force Communications School and Technical Instructor Institute at Scott Air Force Base, Illinois.
5. I am presently president and engineer for *BIG M BROADCAST SERVICES* of Spokane, Washington and *BIG M BROADCAST ASSOCIATES* of Bozeman, Montana. I am also employed as announcer/operator at KMBI AM/FM at Spokane, Washington and am also an instructor for the *AMERICAN SCHOOL OF BROADCAST* at Spokane.
6. I am familiar with all FCC rules that pertain to radio and TV broadcasting.

I HEREBY STATE that the above statements are correct and reflect a true resume of my experience and ability.

  
C Howard McDonald, president/chief engineer

*THEREFORE:*

*BIG COUNTRY CHRISTIAN RADIO INSTITUTE, a non-profit religious organization, incorporated under the laws of Montana, requests that the Commission grant the attached petition for rulemaking.*

*C Howard McDonald* \_\_\_\_\_

*2/19/99* \_\_\_\_\_

*C Howard McDonald*

*date*

*Representative for*

*Big Country Christian Radio Institute*

*(509) 484-4531*

*927 East Glass Avenue*

*(800) 498-4531 + 97*

*Spokane WA 99207*